

~~PROPRIETARY~~



South Texas Project Electric Generating Station 4000 Avenue F – Suite A Bay City, Texas 77414

September 16, 2009  
U7-C-STP-NRC-090130  
10 CFR 2.390  
10 CFR 52

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

South Texas Project  
Units 3 and 4  
Docket No. 52-012 and 52-013  
Submittal of Combined License Application Revision 3

STP Nuclear Operating Company (STPNOC) submits Revision 3 to the South Texas Project Units 3 & 4 (STP 3 & 4) Combined License Application (COLA) (Reference 1) as an enclosure to this letter, and Safeguards Information to follow under separate cover. This letter contains attachments and enclosures providing the following:

- Attachment 1 – “Affidavits for Withholding Proprietary Information under 10 CFR 2.390,” on behalf of Nuclear Innovation North America (NINA) and City Public Service Board (CPS Energy).
- Attachment 2 – “Summary of Preflight Evaluations,” checks performed on the PDF files for each Part included with this submittal (Enclosures 1 and 2).
- Attachment 3 – “Summary of Commitments,” completed, revised, or added (new).
- Attachment 4 – “Summary of Changes” incorporated into Revision 3 to the COLA (References 1 through 12).
- Attachment 5 – “List of RAI Responses with Changes to the COLA,” NRC staff Requests for Additional Information (RAI) which required changes to the COLA in the responses, incorporated as of Revision 3.
- Enclosures (2) – Two DVDs containing Revision 3 to the COLA in PDF format, prepared in compliance with “Guidance for Electronic Submissions to the NRC.” Each DVD contains a packing slip that explains the contents.

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Enclosure 1 (DVD) provides a complete, non-proprietary and non-security-sensitive version of the STP 3 & 4 COLA suitable for public disclosure.

Enclosure 2 (DVD) provides a complete proprietary version of the STP 3 & 4 COLA and includes the proprietary and Security Sensitive information:

- Part 1 financial information (Proprietary)
- Part 2 various figures (Security Sensitive)
- Part 8, "Security Plans," contains Safeguards Information documents consisting of the Physical Security Plan, the Training and Qualification Plan, the Safeguards Contingency Plan, and the Cyber Security Plan, to follow under separate cover (References 4 and 5).
- An entirely new Part 11, "Mitigative Strategies Report 10 CFR 52.80(d)" (Security Sensitive)
- Part 10, "Proprietary Information," is unaffected and remains valid at the last submittal revision (Reference 6), and therefore is not included with this submittal.

The referenced ABWR Design Control Document (DCD), Tier 2 Chapter 20, "Question and Response Guide," is incorporated by reference in the COLA. Accordingly, previous requests for exemption from Appendix A to 10 CFR Part 52, Section IV.A.2.a, are withdrawn (References 1 and 2). The non-proprietary (public) version of Revision 4 to the ABWR DCD, as approved by the Design Certification Rule in Appendix A to 10 CFR Part 52, and incorporated by reference in the COLA, is available on the U.S. NRC website and on microfiche in ADAMS Public Legacy Library.

A summary of commitments is provided in Attachment 3.

Upon removal from Enclosure 2 (Proprietary Information), this letter is decontrolled.

If there are any questions regarding this submittal, please contact me at (361) 972-7206, or Bill Mookhoek at (361) 972-7274.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

9/16/2009



Mark A. McBurnett

Vice President, Oversight and Regulatory Affairs  
South Texas Project Units 3 & 4

ccc

Attachments: As stated

Enclosures: 1. DVD, South Texas Project Units 3 & 4 COLA Rev. 03, Non-Proprietary  
2. DVD, South Texas Project Units 3 & 4 COLA Rev. 03, Proprietary

## References:

1. Letter, M. A. McBurnett to Document Control Desk, "Combined License Application," dated September 20, 2007, ABR-AE-07000004
2. Letter, Scott Head to Document Control Desk, "Additional Information Concerning STP COLA Part 2 Chapter 20 Basis for Exemption," dated December 11, 2008, U7-C-STP-NRC-080024 (ML083570600)
3. Letter, Scott Head to Document Control Desk, "Submittal of Mitigative Strategies Report – 10 CFR 52.80(d)," dated May 26, 2009, U7-C-STP-NRC-090050 (ML091470723)
4. Letter, Scott Head to Document Control Desk, "Submittal of Proposed Revisions to STP COLA Part 2, 8, and 9," dated March 24, 2009, U7-C-STP-NRC-090024
5. Letter, Scott Head to Document Control Desk, "Submittal of STP Units 3 & 4 Cyber Security Plan," dated August 26, 2009, U7-C-STP-NRC-090110 (contains Safeguards Information)
6. Letter, Scott Head to Document Control Desk, "Submittal of Combined License Application Part 10," dated December 11, 2008, U7-C-STP-NRC-080068 (ML083530131)
7. Letter, Scott Head to Document Control Desk, "Additional I&C Information," dated February 9, 2009, U7-C-STP-NRC-090009 (ML090430154)
8. Letter, Scott Head to Document Control Desk, "Response to Request for Additional Information," dated May 21, 2009, U7-C-STP-NRC-090048 (ML091460117)
9. Letter, M. A. McBurnett to Document Control Desk, "Response to Request for Additional Information," dated August 18, 2009, U7-C-STP-NRC-090107 (ML092320101)
10. Letter, M. A. McBurnett to Document Control Desk, "Response to Request for Additional Information," dated July 15, 2009, U7-C-STP-NRC-090074 (ML092010088)
11. Letter, Scott Head to Document Control Desk, "Response to Request for Additional Information," dated March 30, 2009, U7-C-STP-NRC-090021 (Proprietary)
12. Letter, Scott Head to Document Control Desk, "Response to Request for Additional Information," dated June 29, 2009, U7-C-STP-NRC-090066 (ML091830339)

cc: w/o attachment except\*  
(paper copy)

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CPS Energy

**ATTACHMENT 1**

**AFFIDAVITS FOR WITHHOLDING PROPRIETARY INFORMATION  
UNDER 10 CFR 2.390**

**UNITED STATES OF AMERICA**

**NUCLEAR REGULATORY COMMISSION**

**In the Matter of**

**STP Nuclear Operating Company**

**South Texas Project Units 3 and 4**

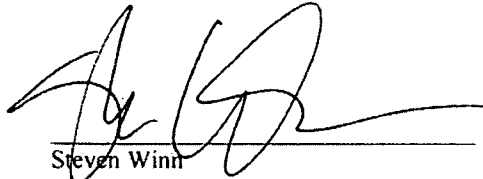
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**Docket Nos. 52-012  
& 52-013**

**AFFIDAVIT**

I, Steven Winn, President of NINA Texas 3 LLC, NINA Texas 4 LLC, NINA Investments LLC, and Nuclear Innovation North America LLC, and Executive Vice President of NRG Energy, Inc., hereby affirm and state:

1. I am authorized to execute this affidavit on behalf of NINA Texas 3 LLC, NINA Texas 4 LLC, NINA Investments LLC, Nuclear Innovation North America LLC, and NRG Energy, Inc.
2. NINA Texas 3 LLC & NINA Texas 4 LLC are providing information to support its application for a Combined License for STP Units 3 & 4. The information being provided is located in Part I of the application and contains financial projections related to its ownership of the South Texas Project Electric Generating Station. The application also contains proprietary commercial and financial information that should be held in confidence by the NRC pursuant to the policy reflected in 10 CFR2.390(a)(4), because:
  - i. This information is and has been withheld in confidence by NINA Texas 3 LLC, NINA Texas 4 LLC and their affiliates.
  - ii. This information is of a type that is customarily held in confidence by NINA Texas 3 LLC, NINA Texas 4 LLC and their affiliates, and there is a rational basis for doing so because the information contains sensitive financial information concerning projected revenues and operating expenses of NINA Texas 3 LLC and NINA Texas 4 LLC.
  - iii. This information is being transmitted to the NRC voluntarily and in confidence.
  - iv. This information is not available in public sources and could not be gathered readily from other publicly available information.
  - v. Public disclosure of this information would create substantial harm to the competitive position of NINA Texas 3 LLC, NINA Texas 4 LLC and their affiliates by disclosing its internal financial projections.
3. The proprietary information in the COLA is marked with the beginning designation "[s5]" and the ending designation "[e5]." The "5" corresponds to the numbering system used in the NRC's guidance on categories of proprietary information defined in 10 CFR 2.390 and clarified by RIS-2004-11.
4. Accordingly, NINA Texas 3 LLC and NINA Texas 4 LLC request that the designated portions of the COLA be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4).



Steven Winn

President & CEO, Nuclear Innovation North America LLC  
President, NINA Texas 3 LLC & NINA Texas 4 LLC  
EVP, NRG Energy, Inc.

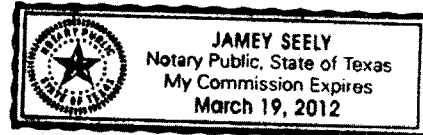
STATE OF TEXAS

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COUNTY OF HARRIS

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Subscribed and sworn to me, a Notary Public, in and for the state of Texas, this 3<sup>rd</sup> day of  
September, 2009.

## NUCLEAR REGULATORY COMMISSION

In the Matter of

STP Nuclear Operating Company

South Texas Project Units 3 and 4

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Docket Nos. 52-012 and 52-013

## AFFIDAVIT


I, Michael K. Kotara, state as follows:

1. I am Executive Vice President, for the City of San Antonio acting by and through the City Public Service Board ("CPS Energy") and I have been delegated the function of reviewing the information described in paragraph (2) which is sought to be withheld, and have been authorized to apply for its withholding.
2. CPS Energy is providing information to support its application for a Combined License for STP Units 3 & 4. The information being provided is located in Part 1 of the application and contains financial projections related to its ownership of the South Texas Project Electric Generating Station. It also contains proprietary commercial and financial information that should be held in confidence by the NRC pursuant to the policy reflected in 10 CFR 2.390(a)(4), because:
  - i. This information is and has been withheld in confidence by CPS Energy and its affiliates.
  - ii. This information is of a type that is customarily held in confidence by CPS Energy and its affiliates, and there is a rational basis for doing so because the information contains sensitive financial information concerning projected revenues and operating expenses of CPS Energy.
  - iii. This information is being transmitted to the NRC voluntarily and in confidence.
  - iv. This information is not available in public sources and could not be gathered readily from other publicly available information.
  - v. Public disclosure of this information would create substantial harm to the competitive position of CPS Energy and its affiliates by disclosing its internal financial projections.
3. The proprietary information in the COLA is marked with the beginning designation "[s5]" and the ending designation "[e5]." The "5" corresponds to the numbering system used in the NRC's guidance on categories of proprietary information defined in 10 CFR 2.390 and clarified by RIS-2004-11.
4. Accordingly, CPS Energy requests that the designated portions of the COLA be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4).

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information, and belief.



Executed on this 3<sup>rd</sup> day of September 2009.

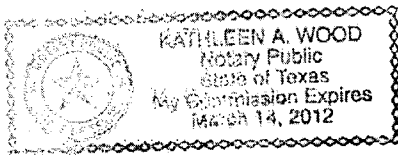
  
Michael K. Kotara  
Executive Vice President,  
Energy Development  
CPS Energy


STATE OF TEXAS

COUNTY OF BEXAR

)  
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The signature above was subscribed and sworn before and to me, a Notary Public, in and for the State of Texas, this 3<sup>rd</sup> day of September, 2009.



  
Notary  
Texas Notary No.: 52670-0

(SEAL)

## **ATTACHMENT 2**

### **SUMMARY OF PREFLIGHT EVALUATIONS**

All submittal PDF files were prepared with Adobe Acrobat Version 8 using the current Job Options file provided by the NRC on its web site. All files passed the preflight check (using the latest NRC preflight profile provided on its web site) except a few files that contained scanned pages that were processed by the Acrobat Optical Character Recognition (OCR) process. In these cases, an error is generated for lack of embedded fonts in the files. This is due to the known and documented inability of Acrobat to embed the fonts in a scanned and OCR processed file.

## SUMMARY OF COMMITMENTS

The following table provides a summary of commitments completed, revised, or added in Revision 3 to the COLA.

| <b>COLA Section<br/>(Commitment<br/>Number)</b> | <b>Commitment Summary</b>   | <b>Milestone</b>  | <b>Commitment<br/>Type</b> |
|---|---|---|----------------------------|
| <b>Part 2</b>                                   |   |   |                            |
| Section 2.4S<br>(COM 2.4S-2)                    | Monthly groundwater levels will be collected through December 2007 from STP 3 & 4 observation wells and updated in the FSAR.  | Future COLA update                                      | Completed                  |
| Section 2.5S<br>(COM 2.5S-1)                    | Resonant Column Torsional Testing results will be added to the FSAR.  | 3 <sup>rd</sup> Quarter of 2008                         | Completed                  |
| Section 2.5S<br>(COM 2.5S-2)                    | Confirmatory subsurface investigation to accommodate addition of a Radwaste Building in the STP 4 area will be updated in FSAR.   | Future COLA Update                                      | Completed                  |
| Appendix 3H<br>(COM 3H-2)                       | Final seismic analysis of site-specific Category I structures to be updated in the FSAR.  | Third quarter of 2008                                   | Completed                  |
| Section 5.3<br>(COM 5.3-1)                      | Fracture toughness for actual materials in pressure vessel will be added to the FSAR.   | One year prior to on-site acceptance of pressure vessel | Revised                    |
| Section 6.1<br>(COM 6.1-2)                      | Analysis of the amount and acceptability of containment coatings not meeting RG 1.54 and ANSI N101.2 will be done in accordance with Appendix B program and available for NRC review. | Prior to completion of pre-operational testing          | Revised                    |
| Section 9.1<br>(COM 9.1-6)                      | As built analysis will be provided to the NRC showing that RHR system is adequately protected from internal hazards such as pipe whip and flooding.                                   | Prior to Fuel Load                                      | Revised                    |
| Section 19Q<br>(COM 19Q-1)                      | Administrative procedure is in place to cope with impending hurricanes.   | Prior to Fuel Load                                      | Deleted                    |

| <b>COLA Section<br/>(Commitment<br/>Number)</b> | <b>Commitment Summary</b>  | <b>Milestone</b>               | <b>Commitment<br/>Type</b> |
|---|--|--------------------------------|----------------------------|
| <b>Part 5</b>                                   |  |                                |                            |
| Section B<br>(COM EP-1)                         | A letter of agreement from the NSSS Vendor will be obtained to support Emergency Plan for an event at STP 3 & 4 on a 24/7 basis.   | Prior to start of construction | Completed                  |
| <b>Part 11</b>                                  |  |                                |                            |
| Section 4.0<br>08-18140-8                       | Validate the currently identified pre-positioned equipment and material staging area will support the site. If the identified position will not support the site identify one that will and enter into the appropriate procedures.                           | Prior to Fuel Load             | New                        |
| Section 4.0<br>08-18140-2                       | Evaluate if an additional assembly area is required for Units 3 & 4. If determined additional assembly area(s) are required ensure these are located a minimum distance of 100 yards from target areas or sufficiently protected.                            | Prior to Fuel Load             | New                        |
| Section 4.0<br>08-18140-5                       | Evaluate if an additional triage and helipad area are required for Units 3 & 4 document in the appropriate procedures/guidelines.  | Prior to Fuel Load             | New                        |
| Section 4.1<br>08-18140-6                       | Include in appropriate procedures to provide alternate on-site water sources in the event the normal supply source is unavailable and an alternate feed path to the fire protection system ring header from the portable trailer mounted diesel driven pump. | Prior to Fuel Load             | New                        |
| Section 4.0<br>08-18140-51                      | Establish LOLA event guidelines that will be implemented and trained on as part of the operational training program.   | Prior to Fuel Load             | New                        |
| Section 4.0<br>08-18140-21                      | Develop a procedure to manually open the vent path valves in the event of a loss of all ac and dc power.   | Prior to Fuel Load             | New                        |

| <b>COLA Section<br/>(Commitment<br/>Number)</b> | <b>Commitment Summary</b>  | <b>Milestone</b>   | <b>Commitment<br/>Type</b> |
|---|--|--------------------|----------------------------|
| Section 4.0<br>08-18140-52                      | Develop additional operational contingency action items for compensatory functions in the event of loss of normal and emergency plant systems.   | Prior to Fuel Load | New                        |
| Section 4.0<br>08-18140-56                      | Evaluate the considerations for equipment survivability and personnel accessibility within plant areas.  | Prior to Fuel Load | New                        |
| Section 4.0<br>08-18140-26                      | Review detailed design requirements to ensure that when feasible and practical Units 3 & 4 pre-configure the spent fuel pool to enable direct placement of the expended assemblies from the reactor vessel to the final preferred configuration. Where this is infeasible or impractical, the fuel should be distributed into the final preferred configuration as soon as possible but no later than 60 days after sub-criticality. | Prior to Fuel Load | New                        |
| Section 4.0<br>08-18140-27                      | STP Units 3 & 4 will ensure highest decay power assemblies should not be located in rack cells positioned above the rack feet. Procedural guidance will be prepared to identify this criterion.  | Prior to Fuel Load | New                        |
| Section 4.0<br>08-18140-53                      | Prepare a plant procedure to include enhancing natural circulation air cooling of spent fuel in the pool by promoting passive ventilation of the bulk air space above the pool with the environs (e.g., opening doorways or blowout panels after an event).  | Prior to Fuel Load | New                        |
| Section 4.0<br>Section 6.0<br>08-18140-54       | Prepare a plant procedure to provide for emergency pool water makeup, and pool leakage reduction and/or emergency repair measures, as well as implementing actions to address adverse radiological conditions.   | Prior to Fuel Load | New                        |

| <b>COLA Section<br/>(Commitment<br/>Number)</b> | <b>Commitment Summary</b>   | <b>Milestone</b>   | <b>Commitment<br/>Type</b> |
|---|---|--------------------|----------------------------|
| Section 4.0<br>08-18140-25                      | <p>A training performance improvement analysis will be completed for STP Units 3 &amp; 4. Initial training programs will be reviewed and revised as necessary. Operations, including fire brigade personnel, security, and emergency response organization personnel will be trained on imminent airborne threat procedures and mitigation procedures. Initial training programs for operations, security, and ERO will be revised to include any revised mitigation strategies prior to fuel load.</p> <p>A station conduct of drills and exercises procedure will specify that ERO drills involving large fires will be conducted every three years, and that integrated security, operations and ERO drills will be conducted every six years.</p> | Prior to Fuel Load | New                        |
| Section 4.0<br>08-18130-28                      | Ensure spray scrubbing runoff is outlined within the integrated spill contingency plan.   | Prior to Fuel Load | New                        |
| Section 4.0<br>08-18140-29                      | Ensure a strategy is developed to direct the ERO to consider use of water spray scrubbing.  | Prior to Fuel Load | New                        |
| Section 4.0<br>08-18140-55                      | Conduct an evaluation of existing dose projection models for their adequacy in projecting doses to event responders onsite under the conditions envisioned for the loss of large area due to fire/explosion.  | Prior to Fuel Load | New                        |
| Section 4.1<br>08-18140-23                      | Review and modify site procedures to incorporate Units 3 & 4 available water sources and pumping methods which may be applicable to support a site wide response to loss of large area event.   | Prior to Fuel Load | New                        |
| Section 4.2<br>08-18140-11                      | Locate communication devices, spare batteries and chargers near the control room or other suitable area.  | Prior to Fuel Load | New                        |

| <b>COLA Section<br/>(Commitment<br/>Number)</b> | <b>Commitment Summary</b>  | <b>Milestone</b>      | <b>Commitment<br/>Type</b> |
|---|--|-----------------------|----------------------------|
| Section 4.2<br>08-18140-47                      | Ensure sufficient number of communication devices will be available for recovery teams.  | Prior to Fuel<br>Load | New                        |
| Section 4.2<br>08-18140-48                      | Position communication devices for responding plant personnel in appropriate locations.  | Prior to Fuel<br>Load | New                        |
| Section 4.2<br>08-18140-49                      | Ensure multiple communication channels will be available onsite that are available and dedicated to various work groups to include all four unit control rooms, fire brigade, security and ERO.  | Prior to Fuel<br>Load | New                        |
| Section 4.2<br>08-18140-50                      | Ensure fire brigade members will be capable of communicating with the control room via a separate channel or other means.  | Prior to Fuel<br>Load | New                        |
| Section 5.1<br>08-18140-32                      | Include in the development of procedures for fire protection to address the isolation of damaged fire headers post event.  | Prior to Fuel<br>Load | New                        |
| Section 6.2<br>08-18140-37                      | Design a dry-pipe system consisting of 2 separate trains that are physically located in opposite corners of the SFP and is routed from ground level elevation to the SFP elevation. Each standpipe contains a check valve and/or associated valves to maintain reactor building envelope. System should be designed to ensure at least a 500 gpm flow is available to the SFP. A permanent monitor nozzle and a 4 inch valve aimed at the SFP should be provided at each end of the standpipe. | Prior to Fuel<br>Load | New                        |
| Section 6.0<br>Section 6.3<br>08-18140-36       | Develop appropriate SFP leakage control strategies and procedure guidance that will list the typical material and expected material locations.   | Prior to Fuel<br>Load | New                        |
| Section 7.1<br>08-18140-38                      | Develop extreme damage mitigating guides as described in NEI 06-12 Revision 2.   | Prior to Fuel<br>Load | New                        |

| <b>COLA Section<br/>(Commitment<br/>Number)</b> | <b>Commitment Summary</b>   | <b>Milestone</b>      | <b>Commitment<br/>Type</b> |
|---|---|-----------------------|----------------------------|
| Section 7.4<br>08-18140-39                      | Develop training on manual operation of the RCIC turbine; include in field level instrumentation capabilities and working environment while operating the RCIC manually.  | Prior to Fuel<br>Load | New                        |
| Section 7.4<br>08-18140-40                      | Develop a procedure for manual operation of the RCIC turbine; include in field level instrumentation capabilities. Include in precautions the environmental conditions that may be present during operations in manual.                 | Prior to Fuel<br>Load | New                        |
| Section 7.6<br>08-18140-41                      | Develop a procedure for providing make-up to the condensate storage tank from the other unit's DWST or one of the Prover tanks or using portable skid mounted diesel driven pump supplied from these and other available water sources. | Prior to Fuel<br>Load | New                        |
| Section 7.7<br>Section 7.10<br>08-18140-42      | Develop a procedure for supplying water to the containment (drywell) or the reactor pressure vessel employing the ACIWA system and/or the portable trailer mounted diesel driven pump.  | Prior to Fuel<br>Load | New                        |
| Section 7.8<br>08-18140-43                      | Develop a procedure to use the portable trailer mounted diesel driven pump to provide spray capabilities to either the SFP or other identified locations if the fire protection system is unavailable.                                  | Prior to Fuel<br>Load | New                        |
| Section 7.11<br>08-18140-44                     | Design a flange connection to provide make-up to the condenser hotwell for feeding the hotwell if the fire protection system is unavailable.  | Prior to Fuel<br>Load | New                        |
| Section 7.12<br>08-18140-45                     | Develop a procedure to maximize control rod drive flows in the event of a LOCA.   | Prior to Fuel<br>Load | New                        |
| Section 7.13<br>08-18140-46                     | Develop a procedure to isolate the clean-up water system.   | Prior to Fuel<br>Load | New                        |



## SUMMARY OF CHANGES

The following table is a summary of changes incorporated into Revision 3 to the COLA.

| <b>Description of Change</b>   | <b>Reference<br/>(Refer to Cover Letter)</b>           |
|--|--|
| Responses to NRC staff Requests for Additional Information (RAIs) which require a change to the COLA are incorporated, as listed.  | Attachment 5   |
| The referenced ABWR DCD, Tier 2 Chapter 20, "Question and Response Guide," is incorporated by reference. Accordingly, previous requests for exemption from Appendix A to 10 CFR Part 52, Section IV.A.2.a, are withdrawn.  | References 1 and 2                                     |
| Part 11, "Mitigative Strategies Report 10 CFR 52.80(d)," is submitted as an entirely new Part to the COLA and incorporates the previous Security Sensitive report submitted in response to 10 CFR 52.80(d) and 10 CFR 50.54 (hh)(2).   | Reference 3  |
| Changes in response to recent rulemaking: <ul style="list-style-type: none"> <li>▪ Fitness for Duty (10 CFR 26) in Part 2, Tier 2 Section 13.7</li> <li>▪ Cyber Security Program (10 CFR 73.54) in Part 2, Tier 2 Section 13.6.3 (Safeguards Information)</li> <li>▪ Physical Security Plan (10 CFR 73.55) in Part 8 (Safeguards Information)</li> </ul>   | References 4 and 5                                     |
| Additional design information related to the Ultimate Heat Sinks.  | None   |
| Minimum Shear Wave Velocities and Soil-Structure Interactions design documentation to support STD DEP T1 5.0-1.  | None   |
| Additional changes due to Instrumentation and Controls (I&C) platform departures, providing information items needed by the NRC staff to complete review of the sections of the COLA related to I&C.   | Reference 7  |
| Three new standard departures from the Generic Technical Specifications, described in Part 7, Generic DCD Departures Report, Section 2.2: <ul style="list-style-type: none"> <li>▪ STD DEP 16.5-5, "TS 5.2.2 Unit Staff – Working Hours"</li> <li>▪ STD DEP 16.3-95, "LCO 3.2.3 Linear Heat Generation Rate (LHGR) (Non-GE Fuel)"</li> <li>▪ STD DEP 16.3-96, "LCO 3.4.1, RIPS Operating"</li> </ul> | References 8 and 9<br>Interim Staff Guidance<br>ISG-08 |

| <b>Description of Change</b>  | <b>Reference<br/>(Refer to Cover Letter)</b>        |
|---|---|
| <p>Changes to the Technical Specifications in conformance with Interim Staff Guidance ISG-08, including the following:</p> <ul style="list-style-type: none"><li>▪ A new Technical Specification 5.5.2.11, "Setpoint Control Program (SCP)," governs the methodology for establishing the setpoints for instrumentation functions.</li><li>▪ Technical Specification 5.7.1.6, "Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)," identifies the analytical methods previously approved by the NRC for determining the pressure/temperature limits.</li><li>▪ All Technical Specification brackets have been filled in and the brackets removed in conformance with Interim Staff Guidance ISG-08 (Acceptance Review Item 6).</li></ul> | References 8 and 9<br>Interim Staff Guidance ISG-08 |
| <p>Two new Tier 2 standard departures:</p> <ul style="list-style-type: none"><li>• STD DEP 3B-2, "Revised Pool Swell Analysis," described in Part 7, Generic DCD Departures Report, new Section 2.3, "Tier 2 Departures from DCD Requiring Prior NRC Approval"</li><li>• STD DEP 5.4-5, "Addition of a vent line from the Reactor Water Cleanup System Reactor Pressure Vessel (RPV) head-spray line to the Reactor Head Vent Line," described in Part 7, Generic DCD Departures Report, Section 3.0, "Departures Not Requiring Prior NRC Approval"</li></ul>   | Reference 10  |
| <p>Company name changes to Nuclear Innovation North America (NINA) LLC, NINA Texas 3 LLC, and NINA Texas 4 LLC.</p>   | Reference 11  |
| <p>Part 3, Environmental Report, updates to include the Alternate Sites Analysis.</p>   | Reference 12  |
| <p>Various editorial changes to correct minor discrepancies.</p>  | None  |

## LIST OF RAI RESPONSES WITH CHANGES TO THE COLA

The tables below provide NRC staff Requests for Additional Information (RAI) which require a change to the COLA in the response and are incorporated **as of Revision 3**.

RAI responses that require a change to the COLA and are not included in this table will be incorporated into the next routine revision to the COLA.

**Table 1: Safety-Related RAI Responses**

| RAI Question No.  | RAI Letter No. | Part | Section(s)   |
|-------------------|----------------|------|--|
| 1-1               | 77             | 1    | (various), Table 1.2-3, and Figure 1.1-1                             |
| 1-2               | 77             | 1    | 1.2, Tables 1.2-1 and 1.2-2  |
| 02.01.02-1        | 11             | 2    | Tier 2, Figure 2.1S-3  |
| 02.02.03-1        | 17             | 2    | Tier 2, 2.2S, Appendix A   |
| 02.02.03-6        | 59             | 2    | Tier 2, 2.2S.3, Tables 2.2S-10 and 2.2S-11                           |
| 02.02.03-7        | 59             | 2    | Tier 2, 2.2S.3, Tables 2.2S-3, 2.2S-10 and 2.2S-11                   |
| 02.03.01-2        | 9              | 2    | Tier 2, 2.3S.1   |
| 02.03.01-10       | 65             | 2    | Tier 2, 2.3S.1   |
| 02.03.01-12       | 67             | 2    | Tier 2, Table 2.0-1  |
| 02.03.01-13       | 67             | 2    | Tier 1, Table 5.0 (Note 8)   |
| 02.03.01-14       | 68             | 2    | Tier 2, 2.3S.1   |
| 02.03.01-15       | 69             | 2    | Tier 2, 2.3S.1   |
| 02.03.01-16       | 69             | 2    | Tier 2, 2.3S.1   |
| 02.03.01-18       | 69             | 2    | Tier 2, 2.3S.1, Table 2.3S-1   |
| 02.03.01-20       | 69             | 2    | Tier 2, 2.3S.2, Table 2.3S-5   |
| 02.03.01-21       | 92             | 2    | Tier 2, 2.3S.1   |
| 02.03.01-5        | 9              | 2    | Tier 2, 2.3S.1, Table 2.3S-3, Table 2.0-2, and 3H.6                  |
| 02.03.01-6        | 9              | 2    | Tier 2, 2.3S.1   |
| 02.03.01-7        | 9              | 2    | Tier 2, 2.3S.1   |
| 02.03.01-8        | 9              | 2    | Tier 2, 2.3S.1, and 9.2.5  |
| 02.03.02-5        | 70             | 2    | Tier 2, 2.3S.2   |
| 02.03.02-6        | 70             | 2    | Tier 2, 2.3S.2   |
| 02.03.02-7        | 84             | 2    | Tier 2, 2.3S.2   |
| 02.03.03-6        | 71             | 2    | Tier 2, 2.3S.3   |
| 02.03.04-4        | 63             | 2    | Tier 2, 2.3S.3, 2.3S.4, Tables 2.3S-13 and 2.3S-14                   |
| 02.03.04-5 (NOTE) | 63             | 2    | Tier 2, 2.3S.4, 2.3S.5, Tables 2.3S-21 to 2.3S-27, and Figure 2.1S-3 |
| 02.03.04-6        | 74             | 2    | Tier 2, 2.3S.4   |
| 02.03.04-7        | 74             | 2    | Tier 2, 2.3S.4   |
| 02.03.05-1        | 20             | 2    | Tier 2, 2.3S.5   |
| 02.03.05-2        | 20             | 2    | Tier 2, 2.3S.5   |

| RAI Question No.   | RAI Letter No. | Part | Section(s)   |
|--------------------|----------------|------|--|
| 02.03.05-3         | 30             | 2    | Tier 2, Tables 2.3S-26 and 2.3S-27   |
| 02.03.05-6         | 64             | 2    | Tier 2, 2.3S.5   |
| 02.03.05-7         | 64             | 2    | Tier 2, 2.3S.5   |
| 02.03.05-9         | 72             | 2    | Tier 2, 2.3S.5   |
| 02.03.05-10        | 72             | 2    | Tier 2, Table 2.3S-29  |
| 02.04.01-2         | 42             | 2    | Tier 2, 2.4S.1   |
| 02.04.03-4         | 32             | 2    | Tier 2, 2.4S.3   |
| 02.04.03-5         | 32             | 2    | Tier 2, 2.4S.3   |
| 02.04.03-6         | 32             | 2    | Tier 2, 2.4S.3   |
| 02.04.03-7         | 32             | 2    | Tier 2, 2.4S.3   |
| 02.04.03-8         | 32             | 2    | Tier 2, 2.4S.3   |
| 02.04.04-8 (NOTE)  | 33 Revised     | 2    | Tier 2, 2.4S.4   |
| 02.04.04-9 (NOTE)  | 33 Revised     | 2    | Tier 1, Table 5.0<br>Tier 2, Table 2.0-2, 2.4S.1, 2.4S.2, 2.4S.4, and<br>2.4S.4 Tables and Figures (various) |
| 02.04.06-1         | 35             | 2    | Tier 2, 2.4S.6   |
| 02.04.08-1         | 44             | 2    | Tier 2, 2.4S.8   |
| 02.04.11-1         | 38             | 2    | Tier 2, 2.4S.11  |
| 02.04.12-1         | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-2         | 39             | 2    | Tier 2, Table 2.4S.12-14   |
| 02.04.12-4         | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-6         | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-7         | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-8         | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-9         | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-10        | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-11        | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-15        | 39             | 2    | Tier 2, 2.4S.13  |
| 02.04.12-17        | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-19        | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-21        | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-22        | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-23        | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-24        | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.12-25        | 39             | 2    | Tier 2, 2.4S.12  |
| 02.04.13-3         | 40             | 2    | Tier 2, 2.4S.12  |
| 02.04.13-4         | 40             | 2    | Tier 2, 2.4S.12, 2.4S.13   |
| 02.04.13-5         | 40             | 2    | Tier 2, 2.4S.13  |
| 02.04.13-6         | 40             | 2    | Tier 2, 2.4S.13  |
| 02.04.13-7         | 40             | 2    | Tier 2, 2.4S.13  |
| 02.04.13-9         | 40             | 2    | Tier 2, 2.4S.13  |
| 02.04.13-10 (NOTE) | 40             | 2    | Tier 2, 2.4S.13  |

| RAI Question No.   | RAI Letter No. | Part | Section(s)   |
|--------------------|----------------|------|--|
| 02.05.01-1         | 49             | 2    | Tier 2, 2.5S.1   |
| 02.05.01-2         | 49             | 2    | Tier 2, Figures 2.5S.1-15, 2.5S.1-21, and 2.5S.1-22  |
| 02.05.01-5         | 49             | 2    | Tier 2, 2.5S.1   |
| 02.05.01-8         | 49             | 2    | Tier 2, Figures 2.5S.1-41 and 2.5S.1-45  |
| 02.05.01-9         | 49             | 2    | Tier 2, 2.5S.1   |
| 02.05.01-13        | 49             | 2    | Tier 2, 2.5S.1, Figures 2.5S.1-43 and 2.5S.1-45  |
| 02.05.01-14        | 49             | 2    | Tier 2, 2.5S.1   |
| 02.05.01-17        | 49             | 2    | Tier 2, Figure 2.5S.1-17   |
| 02.05.02-3         | 50             | 2    | Tier 2, 2.5S.2   |
| 02.05.02-8         | 50             | 2    | Tier 2, Figure 2.5S.2-7  |
| 02.05.02-10        | 50             | 2    | Tier 2, 2.5S.2   |
| 02.05.02-12        | 50             | 2    | Tier 2, 2.5S.2   |
| 02.05.02-19        | 117            | 2    | Tier 2, 2.5S.2 (various) and 2.5S.4 (various), Tables 2.5S.2-17 to 2.5S.2-20, Figures 2.5S.2-32 to 2.5S.2-51, Tables 2.5S.4-27 to 2.5S.4-34, and Figures 2.5S.4-40 to 2.5S.4-47 and 2.5S.4-57 to 2.5S.4-68 |
| 02.05.03-4         | 51             | 2    | Tier 2, 2.5S.3 (various)   |
| 02.05.04-2         | 52             | 2    | Tier 2, 2.5S.4 (various)   |
| 02.05.04-3         | 52             | 2    | Tier 2, 2.5S.4 (various)   |
| 02.05.04-4         | 52             | 2    | Tier 2, 2.5S.4 (various)   |
| 02.05.04-11        | 52             | 2    | Tier 2, 2.5S.4 (various), Table 2.5S.4-16  |
| 02.05.04-13 (NOTE) | 62             | 2    | Tier 2, 2.5S.4 (various), and 2.5S.4 Tables and Figures (various)  |
| 02.05.04-15        | 62             | 2    | Tier 2, 2.5S.4 (various), and 2.5S.4 Tables and Figures (various)  |
| 02.05.04-16        | 78             | 2    | Tier 2, 2.5S.4   |
| 02.05.04-19        | 78             | 2    | Tier 2, 2.5S.4   |
| 02.05.04-21        | 78             | 2    | Tier 2, 2.5S.4   |
| 03.04.01-3         | 2              | 2    | Tier 2, 1.2.2.16.15  |
| 03.04.01-5         | 4              | 2    | Tier 2, 3.4.1.1.1 and 3.4.2  |
| 03.04.01-7         | 94             | 2    | Tier 2, 3.4 (Table 3.4-1)  |
| 03.06.01-1         | 23             | 2    | Tier 2, 3.6.5.1  |
| 03.07.01-2         | 157            | 2    | Tier 2, 3.7.1, 3A (various)  |
| 03.07.01-8         | 157            | 2    | Tier 2, 3C (various)   |
| 03.07.01-13        | 157            | 2    | Tier 2, 3H.6 (various), Tables 3H.6-1 to 3H.6-9, and Figures 3H.6-1 to 3H.6-40   |
| 03.08.01-2         | 157            | 2    | Tier 2, 3H   |
| 03.08.04-3         | 157            | 2    | Tier 2, 3H.5.3 and 3H.5.5  |
| 03.09.03-2         | 87             | 2    | Tier 2, 3.9.3.4.2  |
| 04.06-1            | 103            | 2    | Tier 2, 13.5   |
| 05.02.05-2         | 47             | 7    | 2.2 (STD DEP 7.3-12)   |

| RAI Question No.       | RAI Letter No. | Part | Section(s)   |
|------------------------|----------------|------|--|
| 05.02.05-3             | 48             | 2    | Tier 2, 5.2.5.2.1  |
| 05.02.05-4             | 53             | 2    | Tier 2, 5.2.6.1  |
| 05.03.01-1             | 82             | 2    | Tier 2, 5.3.4.1  |
| 05.03.01-3             | 82             | 2    | Tier 2, Table 13.4S-1  |
| 05.04.07-2             | 105            | 2    | Tier 2, 7.3.1.1.3  |
| 05.04.07-5             | 105            | 2    | Tier 2, 5.4.7.2.2  |
| 06.01.02-1             | 121            | 2    | Tier 2, 6.1.3.1  |
| 06.02.01.01.C-1 (NOTE) | 76             | 2    | Tier 2, 6.2.1.1 (various), 6.2.2.3.1, and 6.2.8, Table 6.2-1, and 6.2 Figures (various), Ch.16 (various) |
|                        |                | 7    | 2.2 (STD DEP 6.2-2)  |
| 06.02.01.01.C-5        | 76             | 2    | Tier 2, 3B.4.1   |
| 06.02.01.01.C-6 (NOTE) | 76             | 2    | Tier 2, 3B.4.2.1, 3B.7, Table 3B-1, and Figures 3B-12 and 3B-13  |
|                        |                | 7    | 2.3 (STD DEP 3B-2)   |
| 07.01-1 (NOTE)         | 104            | 2    | 7.1S (new)   |
| 07.01-4                | 104            | 2    | Tier 1, 2.2.7, and Figure 3.4b<br>Tier 2, Figures 7.1-2 and 7.2-9, 7.3 (Figure 7.3-2), and 7.9S          |
| 08.01-1                | 96             | 2    | Tier 2, Table 8.1-1,   |
| 08.02-4                | 95             | 2    | Tier 2, 8.2.1  |
| 08.02-7                | 95             | 2    | Tier 2, Table 8.2-3  |
| 08.02-12               | 95             | 2    | Tier 2, 8.2.1  |
| 09.01.03-1             | 25             | 2    | Tier 2, 9.1.6.10   |
| 09.01.04-1             | 45             | 2    | Tier 2, 9.1.4.2.7.2  |
| 09.01.04-2             | 45             | 2    | Tier 2, 9.1.4.2.7.1  |
| 09.01.04-5             | 45             | 2    | Tier 2, 9.1.4.2.3.5, and 9.1.4.2.7.3   |
| 09.01.05-1             | 55             | 2    | Tier 2, 9.1.6.6  |
| 09.01.05-2 (NOTE)      | 55             | 2    | Tier 2, Table 1.8-21   |
| 09.03.03-3             | 27             | 2    | Tier 2, 9.3.3.2  |
| 09.05.02-1             | 104            | 2    | Tier 2, Figure 9.5-2   |
| 10.03-1                | 6              | 2    | Tier 2, 10.3.7.1   |
| 10.03-2                | 22             | 2    | Tier 2, 10.3.2.1   |
|                        |                | 7    | 3.0 (STD DEP 10.3-1)   |
| 10.04.03-2             | 13             | 2    | Tier 2, 10.4.3.3   |
| 10.04.03-3             | 14             | 2    | Tier 2, 10.4 (Figure 10.4-2)   |
| 10.04.05-1             | 54             | 2    | Tier 2, 10.4.5.7.2 and 10.4.5.8.2  |
|                        |                | 9    | 3.0, Table 3.0-9   |
| 10.04.07-2             | 24             | 2    | Tier 2, 10.4.7.2.2   |
| 11.04-2                | 43             | 2    | Tier 2, 11.4.3   |
| 11.04-3                | 97             | 2    | Tier 2, 11.4.2.2.6   |
| 12.02-1                | 73             | 2    | Tier 2, 12.2.2.1   |

| RAI Question No. | RAI Letter No. | Part | Section(s)                           |
|------------------|----------------|------|--------------------------------------|
| 13.03-4          | 56             | 5    | 5.4, Evacuation Time Estimate (ETE)  |
| 13.03-5          | 56             | 5    | 5.4, Evacuation Time Estimate (ETE)  |
| 13.03-6          | 56             | 5    | 5.4, Evacuation Time Estimate (ETE)  |
| 13.03-10         | 56             | 5    | 5.4, Evacuation Time Estimate (ETE)  |
| 13.03-12         | 56             | 5    | 5.4, Evacuation Time Estimate (ETE)  |
| 13.03-14         | 56             | 5    | 5.4, Evacuation Time Estimate (ETE)  |
| 13.03-16         | 56             | 5    | 5.4, Evacuation Time Estimate (ETE)  |
| 13.03-17         | 56             | 5    | 5.4, Evacuation Time Estimate (ETE)  |
| 13.03-19         | 56             | 5    | 5.3, Table of Contents               |
| 13.03-20         | 56             | 5    | 5.1 (E Plan), A, C, E, J, M, and N   |
| 13.03-21         | 56             | 5    | 5.1, A.7                             |
| 13.03-22         | 56             | 5    | 5.1, D.1 and D.2                     |
| 13.03-24         | 56             | 5    | 5.1, Attachment 1                    |
| 13.03-25         | 56             | 5    | 5.1, B.4.7, B.4.8, B.4.9, and B.4.10 |
| 13.03-26         | 56             | 5    | 5.1, B.5.2 (Figure F-2)              |
| 13.03-28         | 56             | 5    | 5.1, B.5.11 and B.5.17               |
| 13.03-29         | 56             | 5    | 5.1, B.6.2                           |
| 13.03-30         | 56             | 5    | 5.1, Attachment 1                    |
| 13.03-31         | 56             | 5    | 5.1, C.3.7                           |
| 13.03-32         | 56             | 5    | 5.1, C.3.6                           |
| 13.03-33         | 56             | 5    | 5.1, Figure B-1                      |
| 13.03-34         | 56             | 5    | 5.1, Table B-1                       |
| 13.03-35         | 56             | 5    | 5.1, Attachment 1                    |
| 13.03-36         | 56             | 5    | 5.1, C.4.8                           |
| 13.03-37         | 56             | 5    | 5.1, Attachment 1                    |
| 13.03-38 (NOTE)  | 56             | 5    | 5.1, Table C-1                       |
| 13.03-40 (NOTE)  | 56             | 5    | 5.1, G.2, G.3, and G.4               |
| 13.03-41         | 56             | 5    | 5.1, Attachment 1                    |
| 13.03-42         | 56             | 5    | 5.1, B.5.2                           |
| 13.03-43         | 56             | 5    | 5.1, Attachment 1                    |
| 13.03-44         | 56             | 5    | 5.1, Attachment 1                    |
| 13.03-45         | 56             | 5    | 5.1, G.9                             |
| 13.03-46         | 56             | 5    | 5.1, D.1                             |
| 13.03-51         | 56             | 5    | 5.1, Attachment 1                    |
| 13.03-52         | 57             | 5    | 5.1, K.1.3                           |
| 13.03-55         | 57             | 5    | 5.1, Figures G-5, G-6, and G-7       |
| 13.03-61         | 56             | 5    | 5.1, Attachment 1                    |
| 13.03-68         | 57             | 5    | 5.1, Attachment 2                    |
| 13.03-72 (NOTE)  | 247            | 5    | 5.1, D.1, and 5.3                    |
| 14.02-5          | 142            | 2    | Tier 2, 14.2S.12.1.81                |
| 14.03.05-1       | 83             | 2    | Tier 1, Table 2.7.5                  |
|                  |                | 9    | 2.0, Table 2.7.5                     |

| RAI Question No.    | RAI Letter No. | Part | Section(s)                                 |
|---------------------|----------------|------|--|
| 14.03.05-2          | 83             | 9    | 3.0, Tables 3.0-1 and 3.0-5                |
| 14.03.05-3          | 83             | 9    | 3.0, Table 3.0-2                           |
| 14.03.06-1          | 83             | 2    | Tier 1, Table 2.2.1                        |
|                     |                | 9    | 2.0, Table 2.2.1                           |
| 14.03.06-2          | 83             | 2    | Tier 1, Table 2.3.3                        |
|                     |                | 9    | 2.0, Table 2.3.3                           |
| 14.03.06-3          | 83             | 9    | 3.0, Table 3.0-1                           |
| 14.03.06-4          | 83             | 9    | 3.0, Table 3.0-2                           |
| 14.03.07-1          | 83             | 9    | 3.0, Table 3.0-1                           |
| 14.03.07-2          | 83             | 9    | 3.0, Table 3.0-1                           |
| 14.03.07-3          | 83             | 9    | 3.0, Table 3.0-3                           |
| 14.03.10-1          | 60             | 9    | 4.0, Table 4.0-1                           |
| 14.03.10-2          | 60             | 9    | 4.0, Table 4.0-1                           |
| 14.03.10-3          | 60             | 9    | 4.0, Table 4.0-1                           |
| 14.03.10-4          | 60             | 9    | 4.0, Table 4.0-1                           |
| 14.03.10-5          | 60             | 9    | 4.0, Table 4.0-1                           |
| 14.03.10-6          | 60             | 9    | 4.0, Table 4.0-1                           |
| 14.03.10-7          | 60             | 9    | 4.0, Table 4.0-1                           |
| 14.03.10-8          | 60             | 9    | 4.0, Table 4.0-1                           |
| 14.03.10-9          | 60             | 9    | 4.0, Table 4.0-1                           |
| 14.03.10-10         | 60             | 9    | 4.0, Table 4.0-1                           |
| 14.03.10-11         | 60             | 9    | 4.0, Table 4.0-1                           |
| 14.03.10-12         | 60             | 9    | 4.0, Table 4.0-1                           |
| 14.03.10-13         | 60             | 9    | 4.0, Table 4.0-1                           |
| 15.01.01-15.01.04-1 | 111            | 2    | Tier 2, 15.1S, Table 15.1S-2               |
| 15.08-1             | 112            | 2    | Tier 2, 15E.4                              |
| 16-1                | 101            | 2    | Tier 2, Chapter 16 (various)               |
|                     |                | 4    | (various)                                  |
|                     |                | 7    | (various)                                  |
| 19.01-2             | 124            | 2    | Tier 2, 19R.4.4                            |
| 19.01-3             | 124            | 2    | Tier 2, 19R.4.6                            |
| 19.01-9             | 124            | 2    | Tier 2, 19R.7.2, 19R.7.4.1                 |
| 19.01-11            | 124            | 2    | Tier 2, 19.4.5, 19Q.6, and 19R.7 (various) |
| 19.01-12            | 124            | 2    | Tier 2, 19K.11.1                           |
| 19-8                | 124            | 2    | Tier 2, 19.2 (Table 19.2-2)                |
| 19-20               | 161            | 2    | Tier 2, 19Q.6                              |

NOTE: RAI response is supplemented, amended or revised.



**Table 2: Environmental RAI Responses for Part 3, Environmental Report (ER)**

| <b>ER RAI<br/>Question No.</b> | <b>ER RAI<br/>Letter No.</b> | <b>Part 3 ER<br/>Section(s)</b> |
|--------------------------------|------------------------------|---------------------------------|
| 02.02-01                       | 1                            | 02.02                           |
| 02.02.01-01                    | 1                            | 02.02                           |
| 02.03-06                       | 2                            | 03.03 and 10.05S                |
| 02.03-07                       | 1                            | 02.03                           |
| 02.03-08                       | 1                            | 02.03                           |
| 02.03-08                       | 2                            | 02.03                           |
| 02.03-09                       | 1                            | 02.03                           |
| 02.03-10                       | 1                            | 02.03                           |
| 02.03-13                       | 1                            | 02.03                           |
| 02.03-14                       | 1                            | 02.03                           |
| 02.04.01-01                    | 1                            | 02.04                           |
| 02.04.01-02                    | 1                            | 02.04 and 04.03                 |
| 02.04.01-05                    | 1                            | 05.03                           |
| 02.04.02-05                    | 1                            | 02.04                           |
| 02.04.02-06                    | 1                            | 02.04                           |
| 02.04.02-08                    | 1                            | 02.04, 04.01, 04.02, and 04.03  |
| 02.04.02-10                    | 1                            | 02.02                           |
| 02.05-02                       | 1                            | 02.05                           |
| 02.05-05                       | 1                            | 02.05                           |
| 02.05-07                       | 1                            | 02.05                           |
| 02.05-08                       | 1                            | 02.05                           |
| 02.05-09                       | 1                            | 02.05                           |
| 02.05-11                       | 1                            | 02.05                           |
| 02.05-13                       | 1                            | 02.05                           |
| 02.05-14                       | 1                            | 02.05                           |
| 02.05-15                       | 1                            | 05.08                           |
| 02.05-18                       | 1                            | 02.05                           |
| 02.05-19                       | 1                            | 02.05                           |
| 02.05-20                       | 1                            | 02.05                           |
| 02.05-21                       | 1                            | 02.05                           |
| 02.05-25                       | 1                            | 02.05                           |
| 02.05-28                       | 1                            | 02.05                           |
| 02.05-29                       | 1                            | 02.05                           |
| 02.06-01                       | 1                            | 02.06                           |
| 02.07-01                       | 1                            | 02.07                           |
| 02.07-04                       | 1                            | 02.07                           |
| 02.07-05                       | 1                            | 03.09S                          |
| 03.04.01-01                    | 1                            | 05.03                           |
| 04.02-11                       | 1                            | 04.02                           |
| 04.03.01-01                    | 1                            | 04.03                           |

| <b>ER RAI<br/>Question No.</b> | <b>ER RAI<br/>Letter No.</b> | <b>Part 3 ER<br/>Section(s)</b> |
|--------------------------------|------------------------------|---------------------------------|
| 04.03.01-02                    | 1                            | 04.03                           |
| 04.03.02-04                    | 1                            | 04.03                           |
| 04.04-01                       | 1                            | 03.10S                          |
| 04.04-02                       | 1                            | 03.10S                          |
| 04.04-03                       | 1                            | 04.04                           |
| 04.04-04                       | 1                            | 04.04                           |
| 04.04-05                       | 1                            | 04.04                           |
| 04.04-06                       | 1                            | 04.04                           |
| 04.04-07                       | 1                            | 04.04                           |
| 04.04-08                       | 1                            | 04.04                           |
| 04.04-10                       | 1                            | 04.04                           |
| 04.04-10                       | 2                            | 04.04                           |
| 04.04-11                       | 1                            | 04.04                           |
| 04.04-12                       | 1                            | 04.04                           |
| 04.04-13                       | 1                            | 04.04                           |
| 04.04-19                       | 1                            | 02.05                           |
| 05.02-02                       | 1                            | 04.02                           |
| 05.03.03.01-01                 | 2                            | 05.03                           |
| 05.03.03.01-02                 | 1                            | 05.03                           |
| 05.04.01-01                    | 1                            | 05.04                           |
| 05.04.01-01(b)                 | 3                            | 05.04                           |
| 05.04.01-02                    | 1                            | 05.04                           |
| 05.08-01                       | 1                            | 05.08                           |
| 05.08-02                       | 1                            | 05.08                           |
| 05.08-03                       | 1                            | 05.08                           |
| 05.08-04                       | 1                            | 05.08                           |
| 05.10-02                       | 1                            | 05.10                           |
| 05.10-03                       | 1                            | 05.10                           |
| 07.01-01                       | 1                            | 07.01                           |
| 07.01-02                       | 1                            | 07.01                           |
| 07.02-03                       | 1                            | 07.02                           |
| 07.02-04                       | 1                            | 07.02                           |
| 07.02-05                       | 1                            | 07.02                           |
| 07.02-07                       | 1                            | 07.02                           |
| 07.02-07                       | 2                            | 07.02                           |
| 08.00-01                       | 1                            | 01.01, 08.00, and 08.01         |
| 09.02.03-02                    | 2                            | 09.02                           |
| 09.03.02-01                    | 1                            | 09.03                           |
| 09.03.02-02                    | 1                            | 09.03                           |
| 09.03.02-03                    | 1                            | 09.03                           |
| 09.03.02-04                    | 1                            | 09.03                           |
| 09.03.03-01                    | 1                            | 09.03                           |

| <b>ER RAI<br/>Question No.</b> | <b>ER RAI<br/>Letter No.</b> | <b>Part 3 ER<br/>Section(s)</b>                          |
|--------------------------------|------------------------------|--|
| 09.03.03-02                    | 1                            | 09.03  |
| 09.03.03-03                    | 1                            | 09.03  |
| 09.03-01                       | 1                            | 09.03  |
| 09.03-01                       | 2                            | 09.03  |
| 09.03-02                       | 1                            | 09.03  |
| 09.03-02                       | 2                            | 09.03  |
| 09.03-03                       | 1                            | 09.03  |
| 09.03-04                       | 1                            | 09.03  |
| 09.03-04                       | 2                            | 09.03  |
| 09.03-05                       | 1                            | 09.03  |
| 09.03-06                       | 1                            | 09.03  |
| 09.03-07                       | 1                            | 09.03  |
| 09.03-08                       | 1                            | 09.03  |
| 09.03-09                       | 2                            | 09.03  |
| 10.05S-03                      | 1                            | 04.06  |
| 10.05S-03                      | 2                            | 03.09S, 04.01, 04.04, 09.02,<br>10.02, 10.04, and 10.05S |